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WACHOVIA MORTGAGE
(fka WORLD SAVINGS BANK, FSB, and
Wachovia Mortgage, FSB and now a division of
Wells Fargo Bank, N.A.)

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

WENDY JOHANNSON, an individual,)	Case No.: C11-2822 WHA
)	
Plaintiff,)	[Hon. William J. Alsup]
)	
vs.)	WACHOVIA MORTGAGE'S PRE-
)	TRIAL RULE 26(A)(3) DISCLOSURES
WACHOVIA MORTGAGE, FSB fka)	
WORLD SAVING BANK, FSB; DEREK)	
WAYNE PHILIPS, an individual dba DKP)	
MORTGAGE; JOSEPH STEVEN CANTER,)	
an individual; and DOES 1 to 100, inclusive,)	
)	
Defendants.)	
)	

Pursuant to FRCP 26(a)(3), Defendant Wachovia Mortgage, a division of Wells Fargo Bank, N.A., successor by merger to Wachovia Mortgage, FSB, ("Wachovia"), hereby makes the following disclosures.

- (i) Names of Witnesses: Michael Dolan, reachable through counsel. Mr. Dolan will be called as a witness only if the need arises.
- (ii) Witness to be presented by deposition: Plaintiff, Wendy Johannson.
- (iii) Documents to be presented as Exhibits: The following documents may be offered as evidence if the need arises.

	DESCRIPTION
1.	Handwritten loan application dated August 24, 2006 (Depo. Ex. 16)
2.	Conditional Loan Approval letter dated August 30, 2006 (WM000118-119)
3.	Deed of Trust, for loan number 0044016020 (Depo. Ex. 2)
4.	Adjustable Rate Mortgage Note (Depo. Ex. 7)
5.	Prepayment Penalty Acknowledgment (Depo. Ex. 23)
6.	Federal Truth In Lending Disclosures Required By Regulation Z (Depo. Ex. 13)
7.	Notice of Right to Cancel – General (Depo. Ex. 9)
8.	Loan Program Disclosure – Pick-A-Payment Loan (Depo. Ex. 24)
9.	Acknowledgment Letter dated September 8, 2006 (Depo. Ex. 8).
10.	Loan Statement re: loan number 44016020 dated 09/16/06 (WM000967-68)
11.	Email dated September 18, 2008 from Mary Kay Gaver to Christina McCrea of Kucsan & McCrea (WM000429)
12.	Email dated October 3, 2008 from Mary Kay Gaver to Brian Kucsan (WM000432-33).
13.	Email dated February 3, 2009 from Mary Kay Gaver to Brian Kucsan
14.	August 15, 2007 Payment Deferral and Capitalization Agreement between Wendy Johansson and Wachovia. (WM000912-13 and 000762)
15.	Pick-A-Payment Loan Request for Initial Loan Payment Amount (WM000387).
16.	Notice of Fire/Hazard Insurance Requirements. (WM00077-78).
17.	Verification of Personal and Loan Information (WM000225).
18.	Trustee's Deed Upon Sale (WM000369-370).
19.	Deferred Interest Acknowledgement (WM00393-394)
20.	Johansson Declaration dated February 5, 2009 (WM000423-425).
21.	Kucsan Declaration dated March 7, 2012.
22.	Workout Modification Worksheet (WM000739-740)
23.	LRC – Loss Mitigation Removal Instructions and Workout Modification Worksheet (WM000741-744).
24.	LRC – Loss Mitigation Removal Instructions and Workout Modification Worksheet (WM000745-748)
25.	March 20, 2007 letter from Wachovia to Plaintiff (WM000899).
26.	Plaintiff's Amended Responses to Special Interrogatories.

Dated: April 23, 2011

ANGLIN, FLEWELLING, RASMUSSEN,
CAMPBELL & TRYTTEN LLP

By: /s/ Robert A. Bailey

Robert A. Bailey

Attorneys for Defendants,

WACHOVIA MORTGAGE

(fka WORLD SAVINGS BANK, FSB, and

Wachovia Mortgage, FSB and now a division of
Wells Fargo Bank, N.A.)

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On the date below, I served a copy of the following document(s):

WACHOVIA MORTGAGE'S PRE-TRIAL RULE 26(A)(3) DISCLOSURES

on all interested parties in said case addressed as follows:

<i>Served Electronically via Court's CM/ECF System:</i>	<i>Served by Other Means (U.S. Mail):</i>
<p><i>Attorneys for Plaintiff</i> James Martinez Law Office of James Martinez 1161 Telegraph Avenue, Suite 720 Oakland, California 94612 Tel: 510.444.7700</p>	<p><i>Pro Se</i> Derek Wayne Phelps 97 Egloff Court Folsom, California 95630</p>

☒ **BY MAIL:** By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Pasadena, California, in sealed envelopes with postage fully thereon.

☒ **FEDERAL:** I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. This declaration is executed in Pasadena, California, on **April 23, 2012.**

Frances Corrales
(Print name)

/s/ Frances Corrales
(Signature)